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CH2M HILL
155 Grand Avenue
Suite 1000
Oakland, CA 94612
P.O.Box 12681
Oakland, CA
94604-2681
Tel 510.251.2426
Fax 510.893.8205

CH2MHILL

January 29, 2007
264204.PC.70/MIPC.C206Q

Mr. Henry Chui
California Environmental Protection Agency,
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2737

Subject: Cleanup Plan for Polychlorinated Biphenyl Sites Building 116 AL#01 and AL#02 in Investigation Area C1, Eastern Early Transfer Parcel, Lennar Mare Island, Vallejo, California

Dear Mr. Chui:

CH2M HILL prepared this letter in compliance with the requirements in the Consent Agreement (Lennar Mare Island, LLC [LMI] et al. 2001) signed April 16, 2001, by LMI, the City of Vallejo, and the State of California Environmental Protection Agency, Department of Toxic Substances Control (DTSC), and in accordance with the *Final Polychlorinated Biphenyl Work Plan* (CH2M HILL 2003). This letter presents the cleanup plan for polychlorinated biphenyl (PCB) Sites Building 116 AL#01 and AL#02 in Investigation Area (IA) C2. Figure 1 shows the location of the former transformer room adjacent to Building 116.

Site Identification

Using visual site surveys and reviews of historical records, building closure reports, and databases of electrical equipment, the Navy identified sites where PCB-containing equipment was located, PCB spills were documented, or contamination was suspected because of building history or visible stains (Tetra Tech Environmental Management, Inc., [TtEMI] 1998). Navy personnel from Supervisor of Shipbuilding, Conversion and Repair, Portsmouth, Virginia, Environmental Detachment (SSPORTS), conducted interim PCB assessments and performed cleanup actions (e.g., washing, scabbling, excavation) in accordance with technical work documents (TWDs), where necessary. Following the SSPORTS interim PCB assessments and necessary cleanup actions, TtEMI personnel collected samples either to confirm SSPORTS findings that no cleanup was necessary or to determine the effectiveness of the cleanup actions. Remaining PCB concentrations indicate that additional cleanup action is necessary at PCB Site Building 116 AL#01, the floor of the former transformer room, excluding the drain, and PCB Site Building 116 AL#02, the floor drain located in the southeast corner of the former transformer room (Figure 2).

Building 116, including the former transformer room, is located in IA C2. Building 116 was built in 1905 and initially served as a production shop. Building 116 is west of Nimitz (formerly California) Avenue, east of Railroad Avenue, north of Rickover Street, and south of 8th Street, in an area designated to remain in the historic core of Mare Island. According to the *Preliminary Land Use Plan* (SWA Group 2000), the proposed future use for Building 116 is

industrial. Figure 2 shows the locations of PCB Sites Building 116 AL#01 and AL#02 in IA C2. Although Building 116 is not scheduled for deconstruction at this time, the roof, walls, and floor of the former transformer room containing PCB Sites Building 116 AL#01 and AL#02 will be deconstructed. The historic significance of this building was reviewed, and it was determined that the former transformer room does not have the same historic significance as Building 116 and, therefore, can be deconstructed (Siler 2006, pers. comm.).

Two PCB sites associated with Building 116 are listed in the Consent Agreement for the Eastern Early Transfer Parcel at Mare Island (LMI et al. 2001): AL#01 and AL#02. This letter addresses both PCB Site Building 116 AL#01 (floor of former transformer room attached to Building 116) and PCB Site Building 116 AL#02 (floor drain inside the transformer room). Documentation of Navy PCB site assessment sampling, cleanup actions, and confirmation sampling for the two Building 116 PCB sites is contained in the *Final Basewide Polychlorinated Biphenyl Confirmation Sampling Summary Report* (TtEMI 1998), in the section for Parcel 04-B1.

Summary of Previous Sampling and Cleanup Actions

Tables 1 and 2 provide summaries of the previous sampling at PCB Sites Building 116 AL#01 and AL#02, respectively. The tables include the sample numbers, matrices, dates, and total PCB concentrations (or laboratory reporting limits if PCBs were not detected). The samples were analyzed for PCBs using United States Environmental Protection Agency (USEPA) Methods SW8080, SW8081, or SW8082.

PCB Site Building 116 AL#01

The transformer room is a small structure, approximately 11 by 25 feet, attached to the western end of Building 116. As part of the initial assessment at PCB Sites Building 116 AL#01 and AL#02, SSPORTS personnel collected six samples (6150-0154 through 6150-0159) on June 4, 1996, in stained areas of the concrete floor (SSPORTS 1996a). PCBs were detected in four samples, at concentrations of 119 (6150-0154), 4 (6150-0155), 788 (6150-0156), and 53,400 (6150-0157) milligrams per kilogram (mg/kg). PCB concentrations were below reporting limits in samples 6150-0158 (less than 1.0 mg/kg) and 6150-0159 (less than 5 mg/kg). Collection locations for these two samples were not provided in historical data for this site. Based on the analytical results for these six samples, SSPORTS issued TWD 96-1350 on October 23, 1996, to remove contamination in the former transformer room (SSPORTS 1996b).

On February 13, 1997, before cleanup activities were performed, 28 solid floor and wall samples (7037-0064 through 7037-0094) and 5 wipe samples (7307-0100 through 7307-0104) were collected from the floor in PCB Site Building 116 AL#01 (Figure 2) (SSPORTS 1996a). PCBs were detected in 27 solid samples, at concentrations ranging from 1.2 to 15,100 mg/kg. PCBs were detected in four wipe samples, at concentrations ranging from 28 to 25,200 micrograms per square centimeter ($\mu g/100\ cm^2$). Wipe sample locations and media were not provided with the historical data for this site. Eight additional samples (7135-0082

through 7135-0089) were collected in PCB Site Building 116 AL#01 on June 10, 1997. PCB concentrations ranged from 1.7 to 25 mg/kg in those samples.

In July 1997, the Navy performed cleanup in accordance with TWD 96-1350 to remove elevated concentrations of PCBs in the concrete floor of PCB Site Building 116 AL#01. Scabbling was performed on the floor of the site to specified depths according to PCB concentrations. Area A (concentrations of 4 and 119 mg/kg) was scabbled to a depth of 0.25 inch below ground surface (bgs), Area B (maximum concentration of 788 mg/kg) was scabbled to 0.5 inch bgs, and Area C (maximum concentration of 53,400 mg/kg) was scabbled to 0.75 inch bgs. Area D (sides of utility vault) was scabbled to 0.25 inch bgs in unstained areas and to 0.75 inch bgs where stains were visible. The locations of these areas are presented in Figure 2. Additional abatement included double-washing with kerosene and rinsing accessible conduit and metal support surfaces as high as 12 inches above the floor, utility vault cover plates, and steel rails, in accordance with the TWD (SSPORTS 1996b).

TtEMI personnel collected two confirmation samples at PCB Site Building 116 AL#01 on July 16, 1997. PCBs were detected at a concentration of 0.06J[1] mg/kg in sample PC1441, and at a concentration of 0.4J mg/kg in sample PC1442 (TtEMI 1998) (Figure 2). Based on these results, PCB assessment and cleanup activities were considered complete (SSPORTS 1996a; TtEMI 1998).

On October 20, 2006, CH2M HILL conducted a soil boring investigation to evaluate the vertical extent of PCB contamination at PCB Sites Building 116 AL#01 and AL#02. Three soil borings (B116AL01-GB0101, B116AL01-GB0103, and B116AL01-GB0106) were advanced at PCB Site Building 116 AL#01 to an approximate depth of 10 feet bgs and soil samples were collected at 2, 4, 6, and 9 feet bgs (Figure 2). Boring B116AL01-GB0101 was advanced to an approximate depth of 4 feet bgs and samples were collected at 2 and 4 feet bgs. Total PCB concentrations in soil sample B116AL01-GB0102-S2 were 0.05 mg/kg. Total PCB concentrations in all other soil samples collected during this investigation were below reporting limits (less than 0.033 mg/kg to less than 0.051 mg/kg). One composite sample, B116AL01-CH0107-CO, was collected from concrete removed from boring locations B116AL01-GB0101 through B116AL01-GB0103 and B116AL01-GB0106. Aroclor-1260 was detected at a concentration of 923 mg/kg in composite concrete sample B116AL01-CH0107-CO.

PCB Site Building 116 AL#02

On February 13, 1997, before performing cleanup activities at PCB Site Building 116 AL#01, SSPORTS personnel collected three samples (7037-0066, 7037-0070, and 7037-0077) from PCB Site Building 116 AL#02 (Figure 2). PCBs were detected at concentrations of 2.2 mg/kg in sample 7037-0066, 2.5 mg/kg in sample 7037-0070, and 18.4 mg/kg in sample 7037-0077.

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[1] A "J" indicates an estimated concentration.

On June 9, 1997, SSPORTS personnel collected one wipe sample (7135-0055) from the floor drain in the northern end of PCB Site Building 116 AL#02 (SSPORTS 1996a). PCBs were detected at a concentration of 69 µg/100 cm^2 in that wipe sample. Analytical results were provided with historical data for this site, but the exact sample collection location could not be identified. The sample location has been estimated on Figure 2 based on exiting historical information, which shows the location of the former floor drain. This sample was collected after abatement was performed under TWD 96-1350. Because of the elevated PCB concentrations in the sample, SSPORTS personnel issued TWD 96-1350 Revision A (SSPORTS 1998), which included removing concrete within a 1-foot radius of the floor drain and excavating and removing the underlying crushed rock foundation and soil. Remediation under TWD 96-1350 Revision A was performed in January 1999. Resampling was not performed under this TWD.

In January 1999, three samples (9-0091, 9-0092, and 9-0102) were collected from PCB Site Building 116 AL#02 during implementation of TWD 96-1350 Revision A (Table 2 and Figure 2). Laboratory reports for these samples indicated that sample 9-0091 was collected from sediment in the drain pipe (6.6 mg/kg), sample 9-0092 was collected from soil beneath the drain pipe (1.0 mg/kg), and sample 9-0102 was collected from the drain pipe interior (4.9 mg/kg). The drain pipe and concrete overlying the pipe were removed during implementation of TWD 96-1350 Revision A and disposed of off site.

TtEMI personnel collected two confirmation samples (PC7109 and PC7110) at PCB Site Building 116 AL#02 on February 19, 1999 (Table 2 and Figure 2). PCBs were detected at a concentration of 0.2 mg/kg in sample PC7109, collected from soil beneath the former drain pipe, and at a concentration of 5.0 mg/kg in sample PC7110, concrete collected from the former drain location (TtEMI 1998). Based on these results, PCB assessment and cleanup activities were considered complete (SSPORTS 1998; TtEMI 1998).

On October 20, 2006, CH2M HILL conducted a soil boring investigation to evaluate the vertical extent of PCB contamination at PCB Sites Building 116 AL#01 and AL#02. Two soil borings (B116AL01-GB0104 and B116AL01-GB0105) were advanced to approximately 10 feet bgs and soil samples were collected at 2, 4, 6, and 9 feet bgs. PCBs were detected in two samples; B116AL01-GB0104-S2 at a total concentration 4.5 mg/kg and B116AL01-GB0105-S2 at a total concentration of 0.23 mg/kg. Total PCB concentrations in all other soil samples from these borings were below reporting limits (less than 0.032 mg/kg to less than 0.038 mg/kg).

Cleanup Plan

PCB concentrations detected in concrete and soil from PCB Sites Building 116 AL#01 and AL#02 exceed the USEPA industrial preliminary remediation goal (PRG) for high-risk PCBs of 0.74 mg/kg (USEPA 2004). Therefore, the proposed cleanup action for PCB Sites Building 116 AL#01 and AL#02 is complete deconstruction of the roof, walls, and floor of the former transformer room. The southeastern wall of this structure is shared with

Building 116. However, because this wall is sheet metal, the sheet metal will be removed without compromising the structural integrity of Building 116.

Because PCB concentrations in soil sample B116AL01-GB0104-S2 (4.5 mg/kg) exceed the 0.74-mg/kg industrial PRG for high-risk PCBs, a 3-square-foot area centered on boring location B116AL01-GB0104 will be removed to a depth of 2 feet. Verification samples will be collected on a grid of 1.6-foot (0.5-meter) spacing. Soil removal will continue until verification sample concentrations are below the cleanup goal. Although PCB Sites Building 116 AL#01 and AL#02 are listed as being indoors, because they are inside a structure that will be deconstructed, this work will be performed in accordance with the *Final Interim Removal Action Work Plan for Outdoor Polychlorinated Biphenyl Sites in the Eastern Early Transfer Parcel* (CH2M HILL 2005) and 40 CFR 761.61(a).

Figure 3 shows the verification sample locations for PCB Sites Building 116 AL#01 and AL#02. After the former transformer room is deconstructed, verification samples will be collected in accordance with 40 CFR 761, Subpart O. Verification samples will be collected on a grid of approximately 6.5-foot (2-meter) spacing. Six discrete samples will be collected from each grid cell and combined into a single composite sample. For grid cells that, because of their position adjacent to a wall, are approximately half the size of a typical cell, three discrete samples will be collected and combined into a single composite sample. For cells that are approximately 9 square feet (about 1 square meter), four discrete samples will be collected and combined into a single composite sample. Figure 3 identifies the discrete collection locations that are planned for each composite sample. However, the final number of verification samples will be determined in the field based on the final dimensions of the removal area.

Figure 4 illustrates the site closure process for PCB Sites Building 116 AL#01 and AL#02 under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Toxic Substances Control Act. According to the *Final Polychlorinated Biphenyl Work Plan* (CH2M HILL 2003), and under CERCLA, a no further action (NFA) determination is appropriate if no potential source and no PCB contamination are present at the site. Even if a potential source of PCB contamination is present in machinery or building materials, NFA is appropriate under CERCLA if there has been no release of PCBs to soil or groundwater and no visible pathways exist for migration of PCBs to soil or groundwater (CH2M HILL 2003). If there has been a known release to soil or groundwater, NFA is also appropriate if the detected PCB concentrations in soil and groundwater do not exceed the applicable PRG, or if results of a site-specific risk evaluation demonstrate that potential risks associated with exposure to residual PCBs are within the risk-management range generally used to determine whether cleanup is necessary.

Samples will be analyzed in accordance with the *Quality Assurance Project Plan* (CH2M HILL 2001) using USEPA Method SW8082. Health and safety will be maintained in accordance with the *Health and Safety Plan for PCB Site Sampling and Remediation* (Appendix A to the *Final Polychlorinated Biphenyl Work Plan;* CH2M HILL 2003). Standard operating procedures (SOPs) for the fieldwork and issues regarding permits and

notifications and site security, access, restoration, and demobilization were addressed in the *Final Polychlorinated Biphenyl Work Plan* (CH2M HILL 2003).

PCB-containing wastes generated from the cleanup will be disposed of off site at a Class II landfill. However, final disposition of the waste will be determined based on results of waste characterization analysis. PCB waste will be managed in accordance with CH2M HILL Health, Safety, and the Environment SOP No. 82 (HSE-82), which was provided in the *Final Polychlorinated Biphenyl Work Plan* (CH2M HILL 2003).

Deconstruction of the entire former transformer room adjacent to Building 116 is estimated to occur in March of 2007. Removal and excavation will continue until the verification sampling results indicate that the cleanup goal has been met.

Conclusions

The maximum remaining verifiable PCB concentrations at PCB Sites Building 116 AL#01 and AL#02 are 923 mg/kg in concrete (composite sample B116AL01-GB0107-CO) and 4.5 mg/kg in soil (sample B116AL01-GB0104-S2). Therefore, the entire former transformer room attached to Building 116 will be deconstructed. The area to be deconstructed will be approximately 11 by 25 feet (approximately 275 square feet). Localized soil removal will occur at boring B116AL01-GB0104. This cleanup action is planned for March 2007.

Please submit your approval of this cleanup plan for PCB Sites Building 116 AL#01 and AL#02 to Michael Sanchez at the above address or via email at Michael.Sanchez@ch2m.com within 30 calendar days of receiving this letter. If you have questions or concerns regarding this cleanup plan, please contact Michael Sanchez at 530/229-3310 or Steve Farley at 707/562-1015, extension 103.

Sincerely,

CH2M HILL

Michael Sanchez
Project Manager

Stephen M. Farley, P.G.
Quality Control Manager

RDD/063200003 (NLH3306.doc)

Enclosures: Tables 1 and 2, Figures 1 through 4

References

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United States Environmental Protection Agency (USEPA). 2004. *Region 9 Preliminary Remediation Goals.* October 1.

Copy to (with enclosures):

Mr. Brian Thompson
Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Mr. Gordon Hart
Paul, Hastings, Janofsky, Walker, LLP
55 Second Street, 24th Floor
San Francisco, CA 94105-3411

Ms. Carolyn d'Almeida
U.S. EPA Region 9 (SFD 8-1)
75 Hawthorne Street, 9th Floor
San Francisco, CA 94105

Mr. Gil Hollingsworth
Mare Island Conversion Division
City of Vallejo
555 Santa Clara Street
Vallejo, CA 94590-5934
(Electronic copy only)

Mr. Neal Siler
Lennar Mare Island, LLC
690 Walnut Avenue, Suite 100
Vallejo, CA 94592

Ms. Myrna Hayes
816 Branciforte Street
Vallejo, CA 94590

Mr. Bob Palmer
Caretaker Site Office, SF Bay
410 Palm Ave., Bldg. 1, Suite 161
San Francisco, CA 94130
(2 copies)

Mr. Saul Bloom
Arc Ecology
4634 - 3rd Street
San Francisco, CA 94124
(Electronic copy only)

Mr. Bill Kilgore
California Environmental Protection Agency,
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826
(Electronic copy only)

Ms. Sheila Roebuck
Lennar Mare Island, LLC
690 Walnut Avenue, Suite 100
Vallejo, CA 94592
(IAs D1 and H2 only; otherwise without enclosures)

CH2M HILL copies:
Paula Bolio
Melanie Swift
Jen Tausch
Starr Dehn (final link only)
Jim Robbins (final CD only)

Copy to (without enclosures):

Ms. Carolyn Marn
U.S. Fish and Wildlife Service
2800 Cottage Way, Room W-2605
Sacramento, CA 95825

Mr. Frank Gray
California Dept. of Fish & Game
OSPR Headquarters
P.O. Box 944209
Sacramento, CA 94244-2090

Ms. Laurie Sullivan
National Oceanic and Atmospheric Administration
75 Hawthorne Street, 9th Floor
San Francisco, CA 94105
(Electronic copy only via email)

Ms. Patricia Port
U.S. Department of Interior
1111 Jackson Street, Suite 520
Oakland, CA 94607

Mr. Jeff Gove
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Mr. Mike Coffey
6 Oricle Court
American Canyon, CA 94503

Mr. Kenneth Browne
109 El Camino Real
Vallejo, CA 94590

Mr. James O'Loughlin
1449 Sheridan Drive
Napa, CA 94558

Mr. Adam A. Chavez
1031 Florida Street
Vallejo, CA 94590-5513

Mr. Steven Goldbeck
San Francisco Bay Commission
50 California Street, Suite 2600
San Francisco, CA 94102

Mr. Gerald Karr
149 Garden Court
Vallejo, CA 94591

Dr. Tom Charon, M.D.
Solano County Department of Public Health
275 Beck Avenue
Fairfield, CA 94533

Ms. Paula Tygielski
456 East L Street
Benicia, CA 94510

Mr. Donald Parker
Vallejo Fire Department
970 Nimitz Street
Vallejo, CA 94592

Mr. Terry Schmidtbauer
Dept. of Resource Management
County of Solano
675 Texas Street, Suite 5500
Fairfield, CA 94533

Mr. Justice Budu
107 Fieldstone Way
Vallejo, CA 94589

TABLE 1
Sample Results for PCB Site Building 116 AL#01, Eastern Early Transfer Parcel
PCB Sites, Lennar Mare Island, Vallejo, California

Sample Number	Sample Matrix	Sample Date	Total PCB Concentration[a]	Comments
7135-0082	Concrete	06/10/97	12.4 mg/kg	Pre-TWD sample
7135-0083	Concrete	06/10/97	2.6 mg/kg	Pre-TWD sample
7135-0084	Concrete	06/10/97	1.7 mg/kg	Pre-TWD sample
7135-0085	Concrete	06/10/97	3.5 mg/kg	Pre-TWD sample
7135-0086	Concrete	06/10/97	7.6 mg/kg	Pre-TWD sample
7135-0087	Concrete	06/10/97	25 mg/kg	Pre-TWD sample
7135-0088	Concrete	06/10/97	2.3 mg/kg	Pre-TWD sample
7135-0089	Concrete	06/10/97	2.0 mg/kg	Pre-TWD sample
PC1441	Concrete	07/16/97	0.06J mg/kg	Post-TWD sample; TtEMI confirmation sample
PC1442	Concrete	07/16/97	0.4J mg/kg	Post-TWD sample; TtEMI confirmation sample
B116AL01-GB0101-S2	Soil	10/20/06	0.05 mg/kg	Arcolor-1260
B116AL01-GB0101-S4	Soil	10/20/06	<0.035 mg/kg	Arcolor-1260
B116AL01-GB0101-S6	Soil	10/20/06	<0.04 mg/kg	Arcolor-1260
B116AL01-GB0101-S9	Soil	10/20/06	<0.035 mg/kg	Arcolor-1260
B116AL01-GB0102-S2	Soil	10/20/06	<0.036 mg/kg	Arcolor-1260
B116AL01-GB0102-S4	Soil	10/20/06	<0.038 mg/kg	Arcolor-1260
B116AL01-GB0103-S2	Soil	10/20/06	<0.033 mg/kg	Arcolor-1260
B116AL01-GB0103-S4	Soil	10/20/06	<0.038 mg/kg	Arcolor-1260
B116AL01-GB0103-S6	Soil	10/20/06	<0.039 mg/kg	Arcolor-1260
B116AL01-GB0103-S9	Soil	10/20/06	<0.051 mg/kg	Arcolor-1260
B116AL01-GB0106-S2	Soil	10/20/06	<0.038 mg/kg	Arcolor-1260
B116AL01-GB0106-S4	Soil	10/20/06	<0.039 mg/kg	Arcolor-1260
B116AL01-GB0106-S6	Soil	10/20/06	<0.036 mg/kg	Arcolor-1260
B116AL01-GB0106-S9	Soil	10/20/06	<0.034 mg/kg	Arcolor-1260
B116AL01-CH0107-CO	Composite concrete	10/20/06	923 mg/kg	Arcolor-1260

[a]For samples collected by CH2M HILL Total PCB's are calculated by summing all of the detected Aroclor's or by using a proxy value of one half the reporting limit for historically detected Aroclor's and adding this to detected Aroclor's.

Notes:

Sample numbers beginning with PC were collected by TtEMI. Sample numbers beginning with B were collected by CH2M HILL. Other samples were collected by SSPORTS.

J = estimated concentration
g/100 cm^2 = micrograms per 100 square centimeters
mg/kg = milligrams per kilogram
PCB = polychlorinated biphenyl

TABLE 1
Sample Results for PCB Site Building 116 AL#01, Eastern Early Transfer Parcel
PCB Sites, Lennar Mare Island, Vallejo, California

Sample Number	Sample Matrix	Sample Date	Total PCB Concentration[a]	Comments
7135-0082	Concrete	06/10/97	12.4 mg/kg	Pre-TWD sample
7135-0083	Concrete	06/10/97	2.6 mg/kg	Pre-TWD sample
7135-0084	Concrete	06/10/97	1.7 mg/kg	Pre-TWD sample
7135-0085	Concrete	06/10/97	3.5 mg/kg	Pre-TWD sample
7135-0086	Concrete	06/10/97	7.6 mg/kg	Pre-TWD sample
7135-0087	Concrete	06/10/97	25 mg/kg	Pre-TWD sample
7135-0088	Concrete	06/10/97	2.3 mg/kg	Pre-TWD sample
7135-0089	Concrete	06/10/97	2.0 mg/kg	Pre-TWD sample
PC1441	Concrete	07/16/97	0.06J mg/kg	Post-TWD sample; TtEMI confirmation sample
PC1442	Concrete	07/16/97	0.4J mg/kg	Post-TWD sample; TtEMI confirmation sample
B116AL01-GB0101-S2	Soil	10/20/06	0.05 mg/kg	Arcolor-1260
B116AL01-GB0101-S4	Soil	10/20/06	<0.035 mg/kg	Arcolor-1260
B116AL01-GB0101-S6	Soil	10/20/06	<0.04 mg/kg	Arcolor-1260
B116AL01-GB0101-S9	Soil	10/20/06	<0.035 mg/kg	Arcolor-1260
B116AL01-GB0102-S2	Soil	10/20/06	<0.036 mg/kg	Arcolor-1260
B116AL01-GB0102-S4	Soil	10/20/06	<0.038 mg/kg	Arcolor-1260
B116AL01-GB0103-S2	Soil	10/20/06	<0.033 mg/kg	Arcolor-1260
B116AL01-GB0103-S4	Soil	10/20/06	<0.038 mg/kg	Arcolor-1260
B116AL01-GB0103-S6	Soil	10/20/06	<0.039 mg/kg	Arcolor-1260
B116AL01-GB0103-S9	Soil	10/20/06	<0.051 mg/kg	Arcolor-1260
B116AL01-GB0106-S2	Soil	10/20/06	<0.038 mg/kg	Arcolor-1260
B116AL01-GB0106-S4	Soil	10/20/06	<0.039 mg/kg	Arcolor-1260
B116AL01-GB0106-S6	Soil	10/20/06	<0.036 mg/kg	Arcolor-1260
B116AL01-GB0106-S9	Soil	10/20/06	<0.034 mg/kg	Arcolor-1260
B116AL01-CH0107-CO	Composite concrete	10/20/06	923 mg/kg	Arcolor-1260

[a]For samples collected by CH2M HILL Total PC]==]

Notes:

Sample numbers beginning with PC were collected by TtEMI. Sample numbers beginning with B were collected by CH2M HILL. Other samples were collected by SSPORTS.

B's are calculated by summing all of the detected Aroclor's or by using a proxy value of one half the reporting limit for historically detected Aroclor's and adding this to detected Aroclor's.

J = estimated concentration
g/100 cm^2 = micrograms per 100 square centimeters
mg/kg = milligrams per kilogram
PCB = polychlorinated biphenyl

TABLE 2
Sample Results for PCB Sites Building 116 AL#02, Eastern Early Transfer Parcel
PCB Sites, Lennar Mare Island, Vallejo, California

Sample Number	Sample Matrix	Sample Date	Total PCB Concentration [a]	Comments
7037-0066	Concrete	02/13/97	2.2 mg/kg	Pre-TWD sample
7037-0070	Concrete	02/13/97	2.5 mg/kg	Pre-TWD sample
7037-0077	Concrete	02/13/97	18.4 mg/kg	Pre-TWD sample
7135-0055	Oil	06/09/97	69 µg/100 cm^2	Pre-TWD sample
9-0091	Solid	01/21/99	6.6 mg/kg	Post-TWD sample; sediment in pipe
9-0092	Solid	01/21/99	1.0 mg/kg	Post-TWD sample; soil from beneath drain pipe
9-0102	Solid	01/25/99	4.9 mg/kg	Post-TWD sample; oil drain pipe interior
PC7109	Soil	02/19/99	0.2 mg/kg	Post-TWD sample; TtEMI confirmation sample
PC7110	Concrete	02/19/99	5.0 mg/kg	Post-TWD sample; TtEMI confirmation sample
B116AL01-GB0104-S2	Soil	10/20/06	4.5 mg/kg	Arcolor-1260
B116AL01-GB0104-S4	Soil	10/20/06	<0.036 mg/kg	Arcolor-1260
B116AL01-GB0104-S6	Soil	10/20/06	<0.035 mg/kg	Arcolor-1260
B116AL01-GB0104-S9	Soil	10/20/06	<0.036 mg/kg	Arcolor-1260
B116AL01-GB0105-S2	Soil	10/20/06	0.23 mg/kg	Arcolor-1260
B116AL01-GB0105-S4	Soil	10/20/06	<0.032 mg/kg	Arcolor-1260
B116AL01-GB0105-S6	Soil	10/20/06	<0.038 mg/kg	Arcolor-1260
B116AL01-GB0105-S9	Soil	10/20/06	<0.037 mg/kg	Arcolor-1260

[a]For samples collected by CH2M HILL Total PCB's are calculated by summing all of the detected Aroclor's or by using a proxy value of one half the reporting limit for historically detected Aroclor's and adding this to detected Aroclor's.

Notes:

Sample numbers beginning with PC were collected by TtEMI. Sample numbers beginning with B were collected by CH2M HILL. Other samples were collected by SSPORTS.

µg/100 cm^2 = micrograms per 100 square centimeters
mg/kg = milligrams per kilogram
PCB = polychlorinated biphenyl
TWD = technical work document

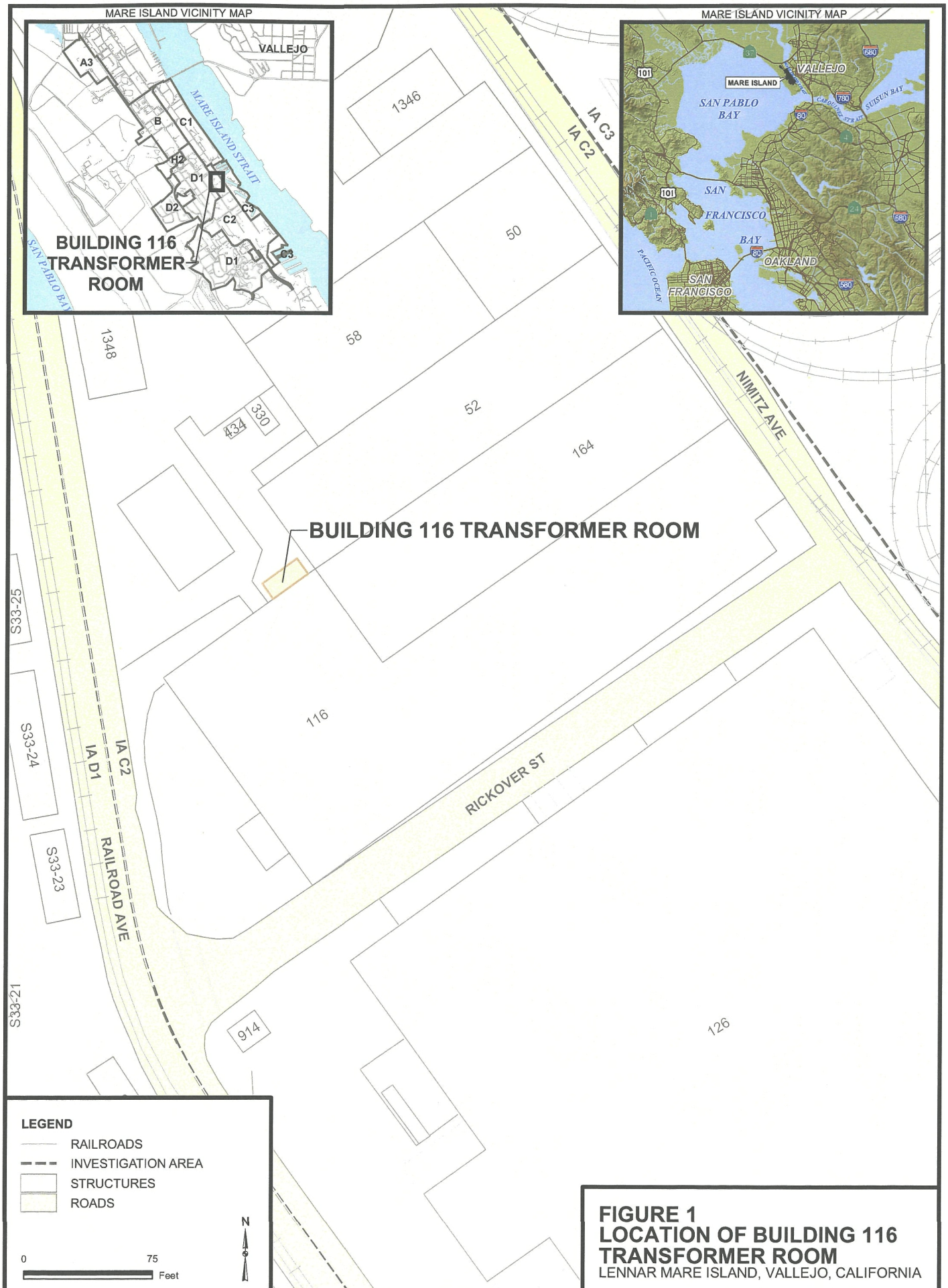
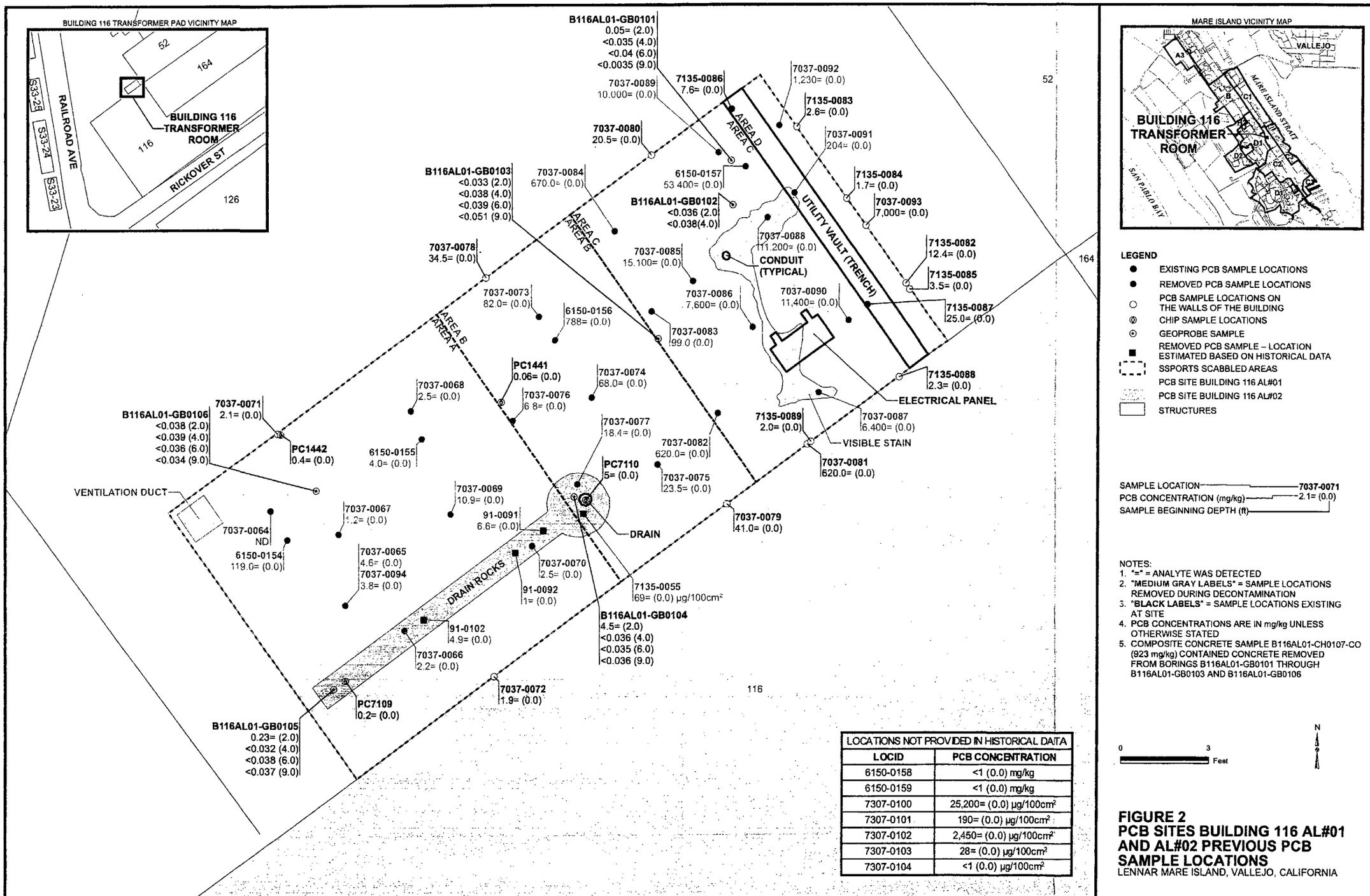


FIGURE 1
LOCATION OF BUILDING 116 TRANSFORMER ROOM
LENNAR MARE ISLAND, VALLEJO, CALIFORNIA

CH2MHILL

RDD \\LOKI\PROJECTS\RDDGIS\MARE_ISLAND\MXDS\PCB\B116\NWP\FIG_1_B116_SITELOC.MXD FIG_1_B116_SITELOC.PDF 11/14/2006 14:02:00



LOCATIONS NOT PROVIDED IN HISTORICAL DATA	
LOCID	**PCB CONCENTRATION**
6150-0158	<1 (0.0) mg/kg
6150-0159	<1 (0.0) mg/kg
7307-0100	25,200= (0.0) µg/100cm²
7307-0101	190= (0.0) µg/100cm²
7307-0102	2,450= (0.0) µg/100cm²
7307-0103	28= (0.0) µg/100cm²
7307-0104	<1 (0.0) µg/100cm²

FIGURE 2
PCB SITES BUILDING 116 AL#01 AND AL#02 PREVIOUS PCB SAMPLE LOCATIONS
LENNAR MARE ISLAND, VALLEJO, CALIFORNIA

CH2MHILL

RDD \\LOKI\PROJECTS\RDDGIS\MARE_ISLAND\MXDS\PCB\B116\NWP\FIG_2_B116_PREV_PCB_SAMPLES.MXD 12/27/2006 08:14:53

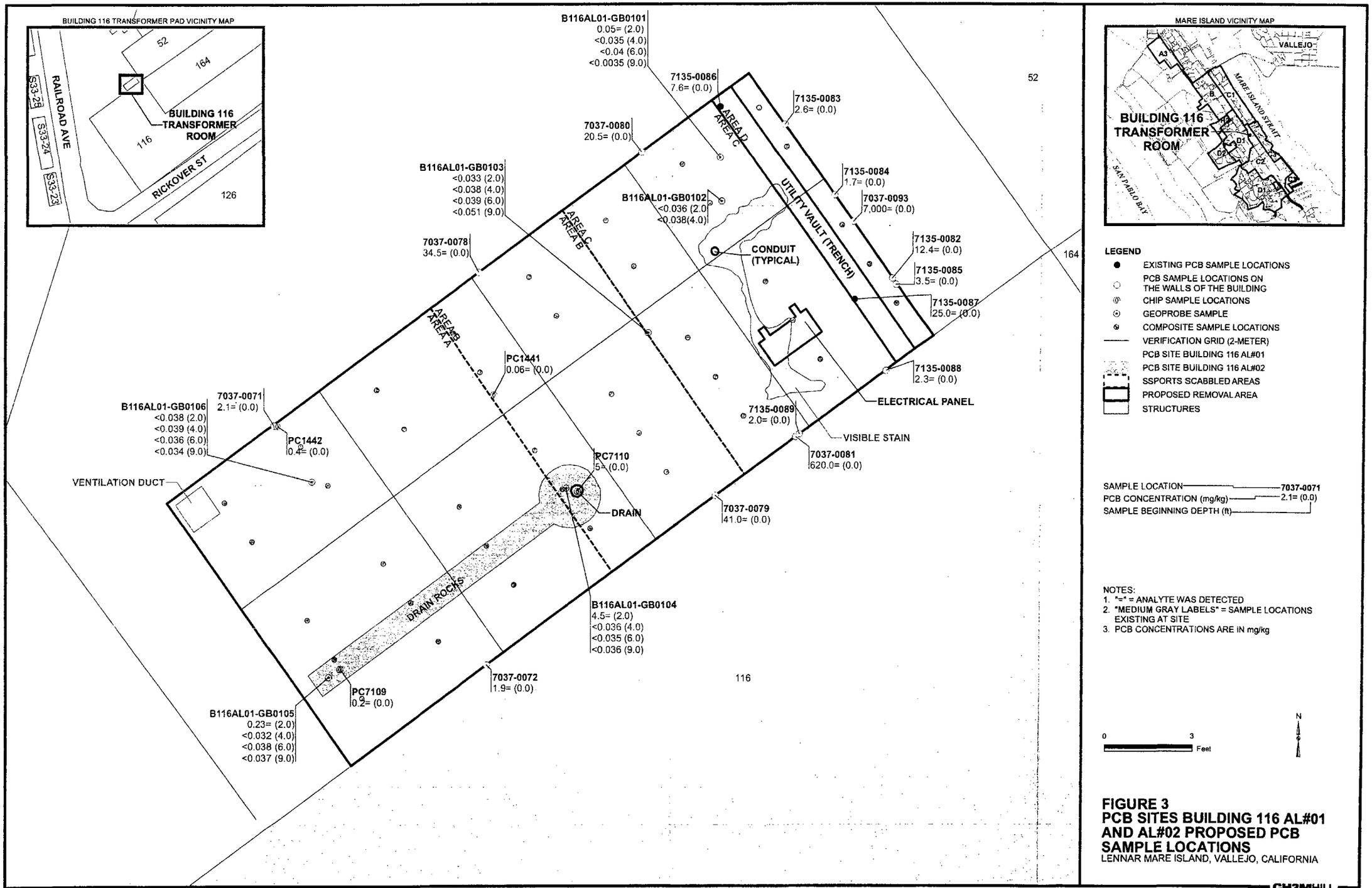
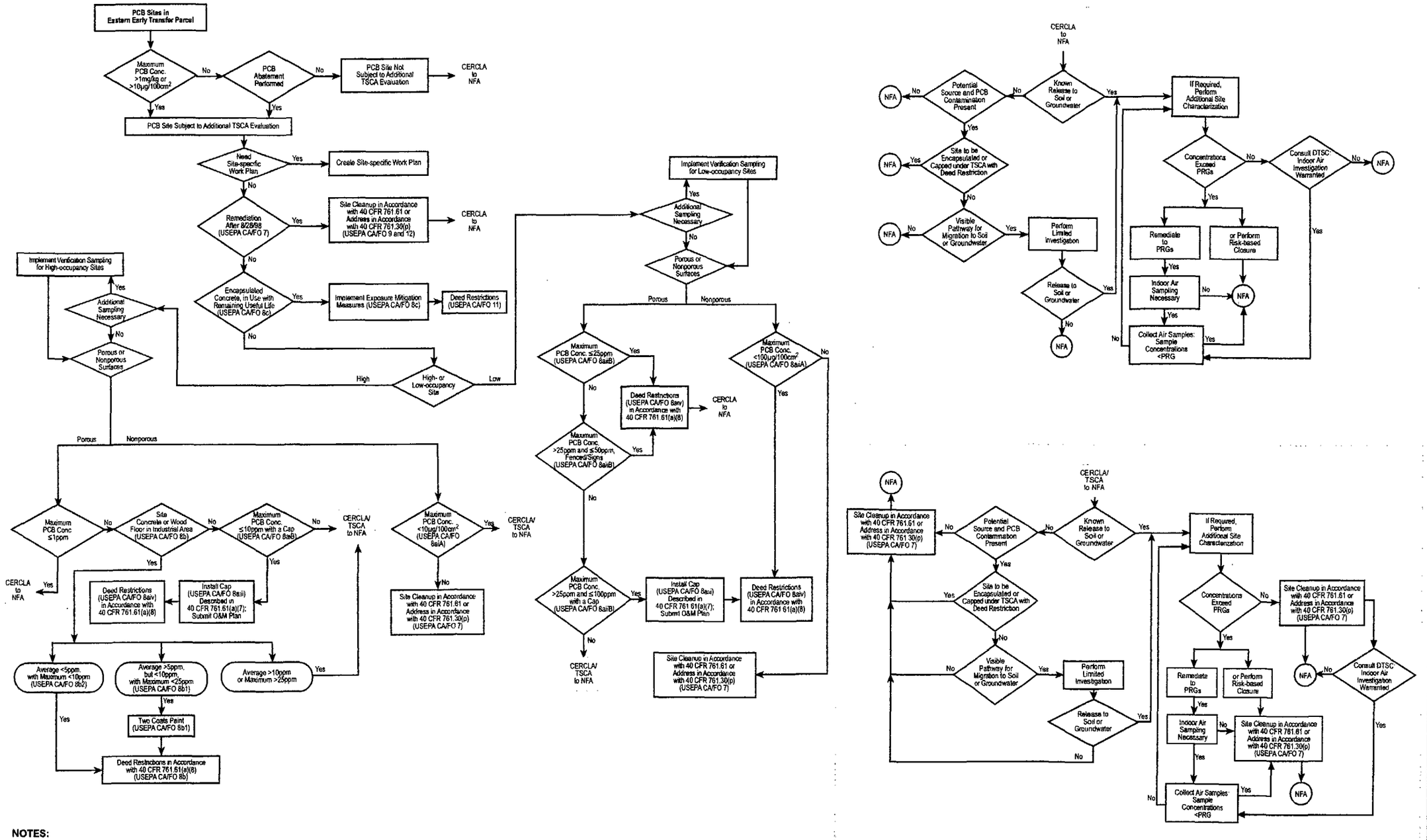


FIGURE 3
PCB SITES BUILDING 116 AL#01 AND AL#02 PROPOSED PCB SAMPLE LOCATIONS
LENNAR MARE ISLAND, VALLEJO, CALIFORNIA

CH2MHILL



NOTES:

USEPA CA/FO = USEPA Consent Agreement/Final Order paragraph number

NFA = No Further Action

O&M = Operations and Maintenance

PRG = Preliminary Remediation Goal

ES052006008RDD_24_Path to Closure (12/28/06)

FIGURE 4
PATH FOR PCB SITE CLOSURE
BUILDING 116 AL#01 and AL#02
LENNAR MARE ISLAND, VALLEJO, CALIFORNIA

CH2MHILL